

# Exhibit B

**Schnake, Katherine G.**

---

**From:** Schnake, Katherine G.  
**Sent:** Tuesday, August 01, 2017 1:19 PM  
**To:** Richard P. Caro (rpc29@yahoo.com)  
**Cc:** Henderson, Matthew R.; Bednarek, Lucy  
**Subject:** Jain - Privilege Log  
**Attachments:** Privilege Log - 8\_1\_17.XLS

Richard,

Attached is the privilege log. Please note that the revisions were done as a professional courtesy. I will not be adding any more information to the log as there is more than sufficient information in the descriptions. If Judge Schenkier disagrees, then we will go back and add the information.

As I indicated in my earlier email, I think that you can parse down the 280 documents you would like us to submit to Judge Schenkier to review. For example, a number of the documents you identified were between Massey and her assistant. While still privileged, those emails relate to the administrative handling of the case (i.e., printing). Please review the new entries for the 280 bates numbers you submitted and advise what bates numbers you would like me to withdraw. Additionally, per Judge Schenkier's minute order yesterday, please provide to us the number of documents you dispute are privileged. Obviously this will go beyond the 280 documents we are potentially submitting.

Finally, I would like to address a question you made regarding the existence of some 122,000 documents. As you pointed out, Catherine Locallo sent a letter to Jain on March 24, 2016 in response to the March 2016 FOIA request by the Jains, which asked for, among other documents, every single document related to [REDACTED]. You asked me to examine the "discrepancy" between the documents we produced and what you believe exists. The FOIA request issued by your clients was incredibly broad. The net they cast with that FOIA is significantly larger than your production request. For example, the FOIA request included all the documents related to the incident where [REDACTED] plagiarized a school report. Documents related to the plagiarism incident would have been responsive to the FOIA, but would not have been responsive to your request in this case. There is no discrepancy. We have either produced or listed in a privilege log all the documents we have responsive to your requests.

Kate

**Kate Schnake**  
Attorney  
Hinshaw & Culbertson LLP  
222 N. LaSalle Street, Suite 300, Chicago, IL, 60601  
Tel: 312-704-3708 | Fax: 312-704-3001  
[KSchnake@hinshawlaw.com](mailto:KSchnake@hinshawlaw.com) | [hinshawlaw.com](http://hinshawlaw.com)

**HINSHAW**  
& CULBERTSON LLP